

SA:RP/MTK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

10 M 0319

UNITED STATES OF AMERICA

COMPLAINT

-against-

DELVON DOWLING,
also known as "Bam Bam,"

(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
1951 and 2)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

WILLIAM PUSKAS, being duly sworn, deposes and states that he is a Task Force Officer with the Joint Robbery Task Force of the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), duly appointed according to law and acting as such.

On or about December 30, 2015, within the Eastern District of New York, the defendant DELVON DOWLING, together with others, did knowingly and intentionally obstruct, delay and affect commerce and the movement of articles and commodities in commerce, to wit: the armed robbery of an Uber car service and its occupants.

(Title 18, United States Code, Sections 1951 and 2)

On or about December 30, 2015, within the Eastern District of New York, the defendant DELVON DOWLING, together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence, to wit: the crime

charged above, and did knowingly and intentionally possess such firearms in furtherance of that crime of violence, one or more of which firearms were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), and 2).

The source of your deponent's information and the grounds for his belief are as follows¹:

1. In the early morning hours of December 30, 2015, an individual known to the Affiant (the "Victim") left a club in Queens, New York (the "Club") and entered a waiting Uber car service (the "Uber car").² As the driver of the Uber car attempted to drive away, multiple vehicles surrounded the Uber car and multiple assailants approached the Uber car with firearms. The Victim got out of the Uber and, when commanded to do so, removed the Victim's property, including two cellular telephones, and provided them to the assailants at gunpoint. One of the assailants discharged his firearm and shot the Victim in the leg. The perpetrators also stole property, including a driver's license, from the Uber driver. The assailants fled.

2. On or about April 1, 2016, the defendant DELVON DOWLING was arrested at his home Brooklyn, New York on unrelated charges. Thereafter, the defendant waived his Miranda rights and spoke with law enforcement officers. In substance and in part, the defendant stated the following:

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest, I have not set forth every fact learned during the course of this investigation.

² Uber is a national car service that picks up passengers for a fee. Passengers using Uber are required to have a membership on an internet-based application. Passengers are required to pay for the service using a credit card, linked to their membership account.

a. The defendant was part of the group of assailants that robbed the Victim on December 30, 2015. The defendant and his coconspirators met earlier that evening in Brooklyn, New York and drove to the Club in three vehicles with the intention of committing a robbery.

b. The defendant and his coconspirators parked the cars outside of the Club for period of time. The defendant was aware that some of his coconspirators had firearms and that, while the defendant waited nearby in one of the vehicles, his coconspirators committed the robbery and that one of the coconspirators shot the Victim.

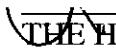
c. After the robbery, the defendant travelled with his coconspirators to Brooklyn, New York and accepted proceeds of the robbery, specifically, two cellular telephones. The defendant sold the cellular telephones to another individual for forty dollars each.

WHEREFORE, your deponent respectfully requests that the defendant
DELVON DOWLING, also known as "Bam Bam," be dealt with according to law.



WILLIAM PUSKAS
Task Force Officer
Joint Robbery Task Force
ATF

Sworn to before me this
2nd day of April, 2016



THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK